

**CRIMINAL****UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK****IN THE MATTER OF THE  
ARBITRATION BETWEEN**

THE NATIONAL FOOTBALL LEAGUE :  
PLAYERS ASSOCIATION On Behalf of :  
Steve Harvey, David Alexander and Marlon :  
Kerner :  
and :  
THE NATIONAL FOOTBALL LEAGUE :  
MANAGEMENT COUNCIL On Behalf of :  
THE BUFFALO BILLS and THE NEW :  
YORK JETS :  
THE NATIONAL FOOTBALL LEAGUE :  
PLAYERS ASSOCIATION On Behalf of :  
Charles Smith, Dusty Renfro, Michael Swift :  
and Jason Peter :  
and :  
THE NATIONAL FOOTBALL LEAGUE :  
MANAGEMENT COUNCIL On Behalf of :  
THE CAROLINA PANTHERS :  
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Civil Action No. 08-cv-3658 (PAC)

**NOTICE OF MOTION AND  
MOTION TO ADMIT  
STACEY R. EISENSTEIN  
*PRO HAC VICE***

PLEASE TAKE NOTICE that upon the accompanying declaration of Sean E. O'Donnell in support of this motion and the Certificates of Good Standing attached thereto, Sean E. O'Donnell will move this Court before the Honorable Paul A. Crotty at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York as soon as the Court may direct, pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York, for an order allowing the admission of Stacey R. Eisenstein, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel.

Stacey R. Eisenstein is a counsel at Akin Gump Strauss Hauer & Feld LLP, and is a member in good standing of the Maryland and District of Columbia bars. There are no pending disciplinary proceedings against Stacey R. Eisenstein in any state or federal court.

WHEREFORE the movant respectfully requests that the Court enter an order in the accompanying form granting Stacey R. Eisenstein admission *pro hac vice* in this case.

Dated: June 6, 2008  
New York, New York

Respectfully submitted,

Sean E. O'Donnell

Sean E. O'Donnell (SO-5005)  
AKIN GUMP STRAUSS HAUER & FELD LLP  
590 Madison Avenue  
New York, New York 10022  
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sodonnell@akingump.com

*Counsel for Respondents The National Football League Management Council, Buffalo Bills, New York Jets, and Carolina Panthers*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE  
ARBITRATION BETWEEN

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<b>THE NATIONAL FOOTBALL LEAGUE</b>	:	
<b>PLAYERS ASSOCIATION On Behalf of</b>	:	
<b>Steve Harvey, David Alexander and Marlon</b>	:	
<b>Kerner</b>	:	Civil Action No. 08-cv-3658 (PAC)
<b>and</b>	:	
<b>THE NATIONAL FOOTBALL LEAGUE</b>	:	
<b>MANAGEMENT COUNCIL On Behalf of</b>	:	
<b>THE BUFFALO BILLS and THE NEW</b>	:	
<b>YORK JETS</b>	:	<b>AFFIDAVIT OF SEAN E.</b>
		<b>O'DONNELL IN SUPPORT OF</b>
		<b>MOTION TO ADMIT STACEY</b>
		<b>R. EISENSTEIN <i>PRO HAC VICE</i></b>
<b>THE NATIONAL FOOTBALL LEAGUE</b>	:	
<b>PLAYERS ASSOCIATION On Behalf of</b>	:	
<b>Charles Smith, Dusty Renfro, Michael Swift</b>	:	
<b>and Jason Peter</b>	:	
<b>and</b>	:	
<b>THE NATIONAL FOOTBALL LEAGUE</b>	:	
<b>MANAGEMENT COUNCIL On Behalf of</b>	:	
<b>THE CAROLINA PANTHERS</b>	:	

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Sean E. O'Donnell, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Akin Gump Strauss Hauer & Feld LLP, counsel for Respondents The National Football League Management Council, Buffalo Bills, New York Jets, and Carolina Panthers in the above-captioned action. I submit this declaration based on my personal knowledge of the facts set forth herein and in support of this motion to admit Stacey R. Eisenstein as counsel *pro hac vice* in this matter.

2. I am a member in good standing of the bar of the State of New York. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Stacey R. Eisenstein is a counsel at Akin Gump Strauss Hauer & Feld LLP. Her business address is 1333 New Hampshire Avenue NW, Washington, DC 20036. Her telephone and facsimile numbers are (202) 887-4427 and (202) 887-4288, respectively, and her email address is [seisenstein@akingump.com](mailto:seisenstein@akingump.com).

4. I have found Stacey R. Eisenstein to be a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Procedure.

5. As shown in the Certificates of Good Standing, attached hereto as Exhibit A, Stacey R. Eisenstein is a member in good standing of the District of Columbia and Maryland bars.

6. There are no pending disciplinary proceedings against Stacey R. Eisenstein in federal or state court.

7. Accordingly, I am pleased to move the admission of Stacey R. Eisenstein *pro hac vice*.

8. I respectfully submit a proposed order, attached hereto as Exhibit B, granting the admission of Stacey R. Eisenstein *pro hac vice*.

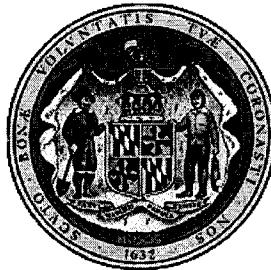
WHEREFORE it is respectfully requested that the motion to admit Stacey R. Eisenstein *pro hac vice* to represent Respondents The National Football League Management Council, Buffalo Bills, New York Jets, and Carolina Panthers in the above-captioned matter be granted.

Respectfully submitted,

Sean E. O'Donnell, Esq.  
Sean E. O'Donnell (SO-5005)  
AKIN GUMP STRAUSS HAUER & FELD LLP  
590 Madison Avenue  
New York, New York 10022  
Telephone: (212) 872-1093  
Facsimile: (212) 872-1002  
sodonnell@akingump.com

*Counsel for Respondents The National Football League Management Council, Buffalo Bills, New York Jets, and Carolina Panthers*

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland, do hereby certify that on the thirteenth day of December, 2000,*

***Stacey Recht Eisenstein***

*having first taken and subscribed the oath prescribed by the Constitution and Laws of this State, was admitted as an attorney of said Court, is now in good standing, and as such is entitled to practice law in any of the Courts of said State, subject to the Rules of Court.*

*In Testimony Whereof, I have hereunto set my hand as Clerk, and affixed the Seal of the Court of Appeals of Maryland, this fifth day of June, 2008.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D.C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

STACEY RECHT EISENSTEIN

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was on the 12<sup>TH</sup> day of OCTOBER, 2001

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duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on June 5, 2008.

GARLAND PINKSTON, JR., CLERK

By: G. M. Charles  
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE  
ARBITRATION BETWEEN

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**THE NATIONAL FOOTBALL LEAGUE** :  
**PLAYERS ASSOCIATION On Behalf of** :  
**Steve Harvey, David Alexander and Marlon** :  
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**and Jason Peter** :  
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**THE NATIONAL FOOTBALL LEAGUE** :  
**MANAGEMENT COUNCIL On Behalf of** :  
**THE CAROLINA PANTHERS** :  
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Civil Action No. 08-cv-3658 (PAC)

**ORDER FOR ADMISSION  
*PRO HAC VICE* ON  
WRITTEN MOTION**

Upon the motion of Sean E. O'Donnell, counsel for Respondents The National Football League Management Council, Buffalo Bills, New York Jets, and Carolina Panthers in the above-captioned action, and the Court having considered the facts as set forth in the supporting Declaration of Sean E. O'Donnell, and good cause having been shown for the relief specified herein,

IT IS HEREBY ORDERED that Stacey R. Eisenstein of Akin Gump Strauss Hauer & Feld LLP is admitted *pro hac vice* to appear or try this particular case in whole or in part as

counsel or advocate for Respondent The National Football League Management Council, Buffalo Bills, New York Jets, and Carolina Panthers in accordance with Local Rule 1.3(c).

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [www.nysd.uscourts.gov](http://www.nysd.uscourts.gov).

Dated:

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United States District Court Judge

**CERTIFICATE OF SERVICE**

I hereby certify that, on June 6, 2008, I caused to be served via overnight mail true and correct copies of the Notice of Motion and Motion to Admit Stacey R. Eisenstein Pro Hac Vice, Declaration of Sean E. O'Donnell in Support of Motion to Admit Counsel Pro Hac Vice, and [Proposed] Order on Petitioner's counsel:

Jeffrey L. Kessler  
Adam J. Kaiser  
Michelle Lo  
DEWEY & LEBOEUF LLP  
1301 Avenue of the Americas  
New York, New York 10019-6092  
*Attorneys for petitioner*  
*National Football League Players Association*

Dated: June 6, 2008  
New York, New York

Sean E. O'Donnell  
Sean E. O'Donnell